

IN THE UNITED STATE DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

KEILEE FANT, et al.)	
)	
Plaintiffs,)	
)	
v.)	
)	Civil Action No. 4:15-CV-253 AGF
)	
THE CITY OF FERGUSON,)	
)	
Defendant.)	
)	

PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME

COME NOW Plaintiffs who move for an order extending the case management schedule by three months, to be equally applied to all deadlines therein. In support thereof, movant states as follows:

1. The Plaintiffs' disclosure of expert witnesses and submission of summaries and reports prior to depositions is due on April 11, 2016.
2. The parties have been engaged in meaningful settlement discussions and in the collection of information in anticipation of mediation on April 21, 2016.
3. No party will be prejudiced by the requested equal extension of all deadlines contained within the case management schedule. Plaintiffs' counsel has conferred with counsel for the Defendant, who has no objection to the requested extension.
4. This motion is made in good faith and is not made for any improper purposes. The requested extension is consistent with the aim of a "just, speedy, and inexpensive determination" of the present action. Fed. R. Civ. P. 1.

WHEREFORE, the Plaintiffs request that the deadlines provided for in the ORDER AMENDING CASE MANAGEMENT ORDER, dated January 12, 2016, be extended by three months, to be equally applied to all deadlines therein.

Respectfully submitted,

/s/ Sonia W. Murphy
Sonia W. Murphy (pro hac vice)
WHITE & CASE LLP
701 THIRTEENTH STREET NW,
Washington, DC 20005
(202) 637-6161
Fax: (202) 639-9355
sonia.murphy@whitecase.com
Co-counsel for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Motion for Extension of Time was served by means of the electronic filing system upon this 8th day of April, 2016.

/s/ Sonia W. Murphy
Sonia W. Murphy